The proposed rulemaking to change sightseeing flights to Part 135 is another misguided effort to make life safer. Even though our company is not directly affected by this measure, we comment on this in hopes of preventing another segment of general aviation being forced out of existence. (We tow banners and are not allowed to fly around stadiums since the FAA transferred airspace control to private entities, i.e. NFL - under the guise of safety and security). The sightseeing segment is already regulated by having to be a commercial pilot and the required drug testing. Putting further strain on this segment will only add to the gradual demise of General Aviation. Unless of course this is the goal of the rulemaking and enforcing agencies, I suggest to refrain from implementing these changes. It seems the 135 Air Tour operators have more accidents to start with - so what will this accomplish other than beating once again on the little guys? Or is a lobbying effort from part 135 Operators suggesting these changes???